

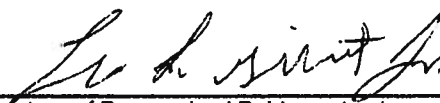
<div>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</div> <div>Michael Jay Berger (SBN 100291) Sofya Davtyan (SBN 259544) Law Offices of Michael Jay Berger 9454 Wilshire Boulevard, 6th floor Beverly Hills, CA 90212 (310) 271-6223 Fax: (310) 271-9805 E-mail: Michael.Berger@bankruptcypower.com E-mail: Sofya.Davtyan@bankruptcypower.com</div>		<div>FOR COURT USE ONLY</div>	
<div><input type="checkbox"/> <i>Movant appearing without an attorney</i></div> <div><input checked="" type="checkbox"/> <i>Attorney for Movant BMW Nationwide Security Inc.</i></div>			
<div>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA</div>			
<div>In re:</div> <div>BMW Nationwide Security Inc.,</div>		<div>CASE NO.: 2:22-bk-12988-VZ</div> <div>CHAPTER: 11</div> <div>NOTICE OF MOTION AND MOTION IN CHAPTER 11 CASE FOR THE ENTRY OF:</div> <div><input checked="" type="checkbox"/> A FINAL DECREE AND ORDER CLOSING CASE; OR</div> <div><input type="checkbox"/> AN ORDER CLOSING CASE ON INTERIM BASIS</div> <div>[11 U.S.C. § 350(a) and 1101(2); FRBP 3022; LBR 3022-1]</div> <div><input checked="" type="checkbox"/> No hearing unless requested under LBR 9013-1(o)(4)</div> <div><input type="checkbox"/> Hearing Information:</div> <div>DATE:</div> <div>TIME:</div> <div>COURTROOM:</div> <div>ADDRESS:</div>	
<div>Debtor.</div>			

PLEASE TAKE NOTICE THAT the Reorganized Debtor or chapter 11 trustee requests the entry of a final decree and/or an order closing a chapter 11 case in which a plan of reorganization was confirmed.

Your rights might be affected by this Motion. You may want to consult an attorney. Refer to the box checked below for the deadline to file and serve a written response. If you fail to timely file and serve a written response, the court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief. You must serve a copy of your opposition upon the Reorganized Debtor, the Reorganized Debtor's attorney, the United States trustee, and on the judge pursuant to LBR 5005-2(d) and the Court Manual.

1. ☒ **No Hearing Scheduled; Notice Provided under LBR 9013-1(o):** This Motion is filed by the Debtor pursuant to LBR 9013-1(o), which provides for granting of motions without a hearing. The full Motion is attached, including the legal and factual grounds upon which the Motion is made. If you wish to oppose this Motion, you must file a written response and request for hearing with the court and serve it as stated above, **no later than 14 days after the date stated on the Proof of Service of this Motion** plus 3 additional days if you were served by mail, electronically, or pursuant to F.R.Civ.P. 5(b)(2)(D), (E), or (F). Your opposition must comply with LBR 9013-1(f) and (o).
2. ☐ **Hearing Set on Regular Notice; Notice Provided under LBR 9013-1(d):** This Motion is set for hearing on regular notice pursuant to LBR 9013-1(d). The full Motion and supporting documentation are attached, including the legal and factual grounds upon which the Motion is made. If you wish to oppose this Motion, you must file a written response with the court and serve it as stated above **no later than 14 days prior to the hearing**. Your response must comply with LBR 9013-1(f). The undersigned hereby verifies that the hearing date and time selected were available for this type of Motion according to the judge's self-calendaring procedures [LBR 9013-1(b)].
3. ☐ **Other (specify):**

Date: 12/29/2022

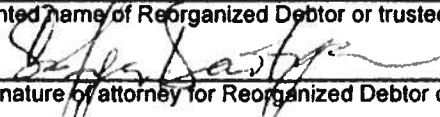


Signature of Reorganized Debtor or trustee

Leo S. Gilbert, President of BMW Nationwide Security, Inc.

Printed name of Reorganized Debtor or trustee

Date: 12/29/2022



Signature of attorney for Reorganized Debtor or trustee, if any

Sofya Davtyan (SBN 259544)

Printed name of attorney for Reorganized Debtor or trustee, if any

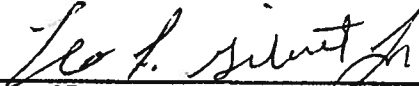
MOTION IN CHAPTER 11 CASE FOR ENTRY OF:

- ☒ **A FINAL DECREE AND ORDER CLOSING CASE; OR**
☐ **AN ORDER CLOSING CASE ON AN INTERIM BASIS**

1. **Movant is the:** ☒ Reorganized Debtor ☐ Chapter 11 trustee
2. **Postconfirmation Status of Bankruptcy Case:** Pursuant to 11 U.S.C. § 1101(2), FRBP 3022, and applicable case law and except as noted in the Declaration:
 - a. The order confirming the plan of reorganization is final;
 - b. All deposits required by the plan have been distributed;
 - c. All property proposed by the plan to be transferred has been transferred
 - d. The Debtor or successor to the Debtor under the plan has assumed the business or the management of the property dealt with by the plan;
 - e. All payments or other distributions under the plan have commenced; and
 - f. All motions, contested matters, and adversary proceedings have been finally resolved.
3. **Relief Requested (check on box only):**
 - a. ☒ **Motion for Entry of Final Decree In a Case that Has Been Fully Administered:** Movant requests the entry of a final decree because the chapter 11 plan has been substantially consummated and the bankruptcy case has been fully administered pursuant to 11 U.S.C. §§ 350(a), 1101(2), FRBP 3022, and applicable case law.
 - b. ☐ **Motion for Entry of an Order Closing the Case on an Interim Basis:** Movant requests the entry of an order closing this bankruptcy case on an interim basis. Though the chapter 11 plan has been substantially consummated, the bankruptcy case cannot be fully administered at this time. At a later time, a motion to reopen the bankruptcy case will be filed so that a motion for entry of discharge (or other motion or contested matter) may be filed and resolved.
4. **Evidence in Support of Motion:** Movant includes as evidence the declaration and any exhibits.

Based on the foregoing, movant requests the court grant the relief requested.

Date: 12/29/2022



Signature of Reorganized Debtor or trustee,
or attorney for Reorganized Debtor or trustee

Leo S. Gilbert, President of BMW Nationwide Security, Inc.
Printed name of Reorganized Debtor or trustee,
or attorney for Reorganized Debtor or trustee

**DECLARATION IN SUPPORT OF MOTION IN CHAPTER 11 CASE FOR ENTRY OF
A FINAL DECREE AND ORDER CLOSING CASE, OR
AN ORDER CLOSING CASE ON AN INTERIM BASIS**

1. Name of Declarant and Foundation for Personal Knowledge:

- a. I, Leo S. Gilbert
make the following declaration in support of this motion.
- b. (1) ☒ I have personal knowledge of the following facts because I am the: President of the
☒ Reorganized Debtor ☐ Chapter 11 trustee
(2) ☒ I am related to this bankruptcy case as
the President and Owner
and I have personal knowledge of the following facts because (specify): I am the president, owner of the
Reorganized Debtor and the disbursing agent for the payments required under the confirmed Subchapter
V Plan.

2. Postconfirmation Status of Bankruptcy Case: except as noted in the following paragraph,

- a. The order confirming the plan of reorganization is final;
b. All deposits required by the plan have been distributed;
c. All property proposed by the plan to be transferred has been transferred;
d. The Debtor or successor to the Debtor under the plan has assumed the business or the management of the property dealt with by the plan;
e. All payments or other distributions under the plan have commenced; and
f. All motions, contested matters, and adversary proceedings have been finally resolved.

3. Exceptions (if any):

4. Facts Regarding Full Administration of Bankruptcy Case (check one box only):

- a. ☒ **The Bankruptcy Case Has Been Fully Administered:** All motions, contested matters, and adversary proceedings have been finally resolved.
b. ☐ **The Bankruptcy Case Has Not Been Fully Administered:** All adversary proceedings have been resolved, but all motions and contested matters have not been finally resolved. It is contemplated that, at a later time, a motion to reopen the bankruptcy case will be filed so that a motion for discharge (or other motion or contested matter) may be filed and resolved.

5. Exhibits (if any). The following exhibits support facts asserted in this declaration:

- ☒ **Exhibit A: Evidence of payments made under the plan.**
☐ **Exhibit B:**
☐ **Exhibit C:**
☐ **Exhibit D:**

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

12/29/2022
Date

Leo S. Gilbert
Printed Name

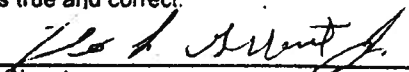

Signature

EXHIBIT-A

BMW NATIONWIDE SECURITY INC
DEBTOR IN POSSESSION
 3701 LONG BEACH BLVD STE 322
 LONG BEACH, CA 90807-3355

1042

16-24/1220 4313

11/24/2022

Date

Pay to the Order of AMERICAN EXPRESS \$ 2,713³⁴
Two thousand seven hundred thirteen dollars w/ 34/100 cents Dollars



Wells Fargo Bank, N.A.
 California
 wells Fargo.com

For

⑆ 122000 247⑆

⑆303⑆ 01042

Z. d. Silvestri
 NP

*Class 2(b)
 paid in full*

BMW NATIONWIDE SECURITY INC
DEBTOR IN POSSESSION
 3701 LONG BEACH BLVD STE 322
 LONG BEACH, CA 90807-3355

1041

16-24/1220 4313

11/29/2022

Date

Pay to the Order of INTERNAL REVENUE SERVICE \$ 2,072⁰⁰
Two thousand seventy two dollars w/ 00/100 cents Dollars



Wells Fargo Bank, N.A.
 California
 wells Fargo.com

For

⑆ 122000 247⑆

⑆9303⑆ 01041

Z. d. Silvestri
 NP

*Priority
 (one-time)
 payment*

BMW NATIONWIDE SECURITY INC
DEBTOR IN POSSESSION
 3701 LONG BEACH BLVD STE 322
 LONG BEACH, CA 90807-3355

1039

16-24/1220 4313

11/29/2022

Date

Pay to the Order of SBA DENVER FINANCE CENTER \$ 9,915⁰⁰
Nine thousand nine hundred fifteen dollars w/ 00/100 cents Dollars



Wells Fargo Bank, N.A.
 California
 wells Fargo.com

For DECEMBER PAYMENT 2022

⑆ 122000 247⑆

⑆9303⑆ 01039

Z. d. Silvestri
 NP

*Class 3(a)
 long-term
 payments*

BMW NATIONWIDE SECURITY INC
DEBTOR IN POSSESSION
 3701 LONG BEACH BLVD STE 322
 LONG BEACH, CA 90807-3355

1043

16-24/1220 4313

11/24/2022

Date

Pay to the Order of AMERICAN EXPRESS \$ 9,504⁹⁵
Nine thousand five hundred four dollars w/ 95/100 cents Dollars



Wells Fargo Bank, N.A.
 California
 wells Fargo.com

50

Z. d. Silvestri
 NP

*Class 2(b)
 paid in full*

Wells Fargo Lease Payments

- Quick Links +
- Home
- Online Payments -
- Pay Invoices
- Manage Recurring Payments
- Payment History
- Manage Payment Accounts
- Customer Service +
- Reports
- Help
- Profile +
- Support +

Click "*" (if visible) to view more columns

Filter

1 to 10 of 37

Confirmation Number	Customer Number	Payment Status	Invoice Number/Confirmation Number	Invoice Date	Payment Date	Payment Amount	Payment Account	Action
12366828	3691967052	Payment Scheduled	5023223928	01/20/2023	12/29/2022	291.52 USD	WELLS FARGO BANK NA - 9303	Download
12366827	3691967052	Payment Scheduled	5023176005	01/16/2023	12/29/2022	569.15 USD	WELLS FARGO BANK NA - 9303	Download
12323311	3691967052	Payment Taken	5022901400	12/27/2022	12/21/2022	292.54 USD	WELLS FARGO BANK NA - 9303	Download
12323310	3691967052	Payment Taken	5022817385	12/20/2022	12/21/2022	338.00 USD	WELLS FARGO BANK NA - 9303	Download
12142615	3691967052	Payment Taken	5022755638	12/16/2022	11/23/2022	593.15 USD	WELLS FARGO BANK NA - 9303	Download
12071835	3691967052	Payment Taken	5022488185	11/27/2022	11/11/2022	292.54 USD	WELLS FARGO BANK NA - 9303	Download
12071834	3691967052	Payment Taken	5022401007	11/20/2022	11/11/2022	291.52 USD	WELLS FARGO BANK NA - 9303	Download
11955508	3691967052	Payment Taken	5022368714	11/16/2022	10/26/2022	565.15 USD	WELLS FARGO BANK NA - 9303	Download
11896275	3691967052	Payment Taken	5022083113	10/27/2022	10/14/2022	376.20 USD	WELLS FARGO BANK NA - 9303	Download
11896274	3691967052	Payment Taken	5021994009	10/20/2022	10/14/2022	291.52 USD	WELLS FARGO BANK NA - 9303	Download

Cancel Payment

Please note that corrections to your account may result in changes to the transactions displayed. If you find an error or otherwise need to discuss your account information, please refer to the phone number on your invoice to contact Customer Care.

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Sign Off

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
9454 Wilshire Blvd., 6th Fl., Beverly Hills, CA 90212

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF MOTION AND MOTION IN CHAPTER 11 CHASE FOR THE ENTRY OF A FINAL DECREE AND ORDER CLOSING CASE** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 1/4/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Counsel: Michael Jay Berger michael.berger@bankruptcypower.com,
yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com
Subchapter V Trustee: Gregory Kent Jones (TR) gjones@sycr.com,
smjohnson@sycr.com;C191@ecfcbis.com;cpesis@stradlinglaw.com
U.S. Trustee: Kelly L Morrison kelly.l.morrison@usdoj.gov
United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
Counsel for Golden Voice: Peter Hugh Crossin pcrossin@bglawyers.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On 1/4/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 1/4/2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Vincet P. Zurzolo
United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1360 / Courtroom 1368
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

1/4/2023

Date

Peter Garza

Printed Name

/s/Peter Garza

Signature

2. SERVED BY UNITED STATES MAIL:

U.S. Trustee
Attn: Kelly Morrison, Esq.
915 Wilshire Blvd., Ste. 1850
Los Angeles, CA 90017

Subchapter V Trustee
Gregory Kent Jones (TR)
Stradling Yocca Carlson & Rauth
10100 N. Santa Monica Blvd., Suite 1400
Los Angeles, CA 90067

SECURED CREDITORS:

Aerofund Financial Inc.
c/o Carol McDonald
6910 Santa Teresa Blvd.,
San Jose, CA 95119

CHTD Company
PO Box 2576
Springfield, IL 62708

U.S. SBA
1545 Hawkins Blvd., Ste. 202
El Paso, TX 79925

U.S. Small Business Admin
El Paso Loan Service Center
10737 Gateway West, Ste. 300
El Paso, TX 79935

U.S. Small Business Admin
Office of General Counsel
312 North Spring St., 5th Fl.
Los Angeles, CA 90012

U.S. Small Business Administration
c/o Elan S. Levey
300 N. Los Angeles Street
Fed. Bldg., Rm 7516
Los Angeles, CA 90012

Wells Fargo Vendor Financial Svc
c/o Compare Business Systems Inc.
PO Box 030310
Los Angeles, CA 90030-0310

20 LARGEST UNSECURED CREDITORS:

AI Malaikah Auditorium Company
c/o Tharpe & Howell, LLP
Robert Salley, Esq.
15250 Ventura Blvd, 9th Floor
Sherman Oaks, CA 91403

Contemporary Services Corporation
Attn: Legal Department
17101 Superior St.
Northridge, CA 91325

Corporate Service Company
801 Adlai Stevenson Dr.
Springfield, IL 62703-4261

Delores Ward
c/o Perona, Langer, Beck, Servin
Attn: Todd Harrison, Esq.
300 East San Antonio Drive
Long Beach, CA 90807

Edna Herrarte-Giron
c/o Weber & Weber
Christopher P. Carney, Esq.
221 E. Glenoaks Blvd., Ste 107
Glendale, CA 91207

First Corpoarte Solutions, Inc.
914 S. Street
Sacramento, CA 95814

Franchise Tax Board
Bankruptcy Section MS: A-340
PO Box 2952
Sacramento, CA 95812-2952

Goldenvoice, LLC
c/o Bradley & Gmelich LLP
Thomas P. Gmelich, Esq.
700 North Brand Blvd., 10th Floor
Glendale, CA 91203

HOB1, LLC
PO Box 901
Culver City, CA 90232

Internal Revenue Service
P O Box 7346
Philadelphia, PA 19101-7346

IRS
Small Business and Self-Employed
501 W. Ocean Blvd., Suite 400
Long Beach, CA 90802

Staff Pro, Inc.
c/o Wilson Elser Moskowitz Edelman
Attn: Ashan K. Peiris, Esq.
555 S. Flower Street, Suite 2900
Los Angeles, CA 90071

Union Rescue Mission
545 S. San Pedro St.
Los Angeles, CA 90013

US Bank
Attn: Cynthia Landino
9467 Milliken Avenue
Rancho Cucamonga, CA 91730